

REMARKS

Claims 19-37 are in the application. Applicants believe that this amendment places the claims in better form for allowance or consideration on appeal, and respectfully request its admission. Applicants note the objection to the drawings, and will file formal drawings under a separate submission.

Rejections under 35 U.S.C. 102

Claims 19-37 are rejected under 35 U.S.C. 102(a) as being anticipated by Kim ('664). This rejection is respectfully traversed.

The Examiner states that '664 teaches a method of making a semiconductor chip package comprising the steps of providing a substrate for mounting a semiconductor die and plating a lead (Pb)-free conductive material made of Ni-Au to project the lead (Pb)-free first lead of copper and Ni-Au outwardly from the substrate.

Applicant's acknowledge that '664 discloses an alternative to lead (Pb) for metal plating layer 60. However, '664 shows leads 30 comprised of a flat base layer 40 (copper), a metal plating layer 60 (Ni-Au or Sn-Pb), and a solder layer 50 (Sn-Pb) (see col. 4, lines 13-37 and FIG. 5 of '664). Thus, none of the leads 30 of '664 are lead (Pb)-free as applicants claim.

More specifically, '664 teaches that metal plating layer 60, which can be comprised of either a Ni-Au or a Sn-Pb, is part of base layer 40. Solder layer 50, which is only described as being comprised of tin (Sn) and lead (Pb), is formed by screen printing onto base layer 40 (see col. 4, lines 33-36 of '664). Each lead 30 is comprised of this

combination of layers, thus '664 only teaches to form leads comprised of lead (Pb).

Thus, because applicants claim at least one lead (Pb)-free lead, not just one of the layers of the lead to be lead (Pb)-free as '664 teaches, '664 cannot anticipate claims 19-37.

CONCLUSION

In view of all of the above, it is believed that the claims are allowable, and the case is in condition for allowance, which action is earnestly solicited.

Respectfully submitted,

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